

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

	X	
	:	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. <sup>1</sup>	:	
	X	

**INFORMATIVE MOTION OF THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO, ACTING BY AND THROUGH  
ITS SPECIAL CLAIMS COMMITTEE, REGARDING ORDER ON  
PROCEDURES FOR ATTENDANCE, PARTICIPATION AND OBSERVATION  
OF THE APRIL 24 - 25, 2019 OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

1. The Financial Oversight and Management Board for the Commonwealth of Puerto Rico (the “Commonwealth”), acting through its Special Claims Committee (the “Special Claims Committee”), hereby submits this informative motion in response to the *Court’s Order Regarding Procedures for Attendance, Participation and Observation of April 24 - 25, 2019 Hearing* [ECF No. 6240] (the “Order”).

2. Edward S. Weisfelner, Esq. and Sunni P. Beville, Esq. of Brown Rudnick LLP will appear in person on behalf of the Claims Committee at the Hearing (as defined in the Order)

---

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

in the assigned Courtroom at the United States District Court for the District of Puerto Rico, Clemente Nazario Courthouse, 150 Carlos Chardon Street, San Juan, PR 00918 to address, as necessary, the following matters:

- a) *Omnibus Objection of (I) Financial Oversight and Management Board, Acting through its Special Claims Committee, and (II) Official Committee of Unsecured Creditors, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007, to Claims Filed or Asserted by Holders of Certain Commonwealth General Obligation Bonds [Docket No. 4784] (the “Omnibus Objection”);*
- b) *Urgent Motion of (I) Financial Oversight and Management Board, Acting Through its Special Claims Committee, and (II) Official Committee of Unsecured Creditors for Entry of Order, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, Establishing Procedures with Respect to Omnibus Objection to Claims Filed or Asserted by Holders of Certain Commonwealth General Obligation Bonds and Requesting Related Relief [Docket No. 4788] (the “Procedures Motion”);*
- c) *Urgent Motion of Official Committee of Unsecured Creditors for Order, Under Bankruptcy Code Sections 105(a) and 926(a) and Bankruptcy Rule 9006, Establishing (I) Procedures with Respect to Disclosure of Avoidance Actions to be Asserted by Oversight Board, and (II) Expedited Briefing Schedule for Potential Request to Appoint Trustee Under Bankruptcy Code Section 926(a) [Docket No. 5997] (the “926(a) Motion”);*

- d) *Motion of The Financial Oversight and Management Board of Puerto Rico for Entry of an Order Equitably Tolling the Time Prescribed by 11 U.S.C. § 546 to Bring Certain Avoidance Actions* [Docket No. 6118] (the “Tolling Motion”);
- e) *Motion of the Ad Hoc Group of General Obligation Bondholders, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, Establishing Procedures With Respect to Omnibus Conditional Objection to Claims Filed or Asserted by the Public Buildings Authority, Holders of Public Buildings Authority Bonds* [Docket No. 6104] (the “Ad Hoc Group Procedures Motion”);
- f) *Urgent Joint Motion for Entry of Order Approving Stipulation and Agreed Order by and Among Financial Oversight and Management Board, its Special Claims Committee, and Official Committee of Unsecured Creditors Related to Joint Prosecution of Debtor Causes of Action* [Docket No. 6305] (the “Joint Stip Motion”);
- g) *Motion of Official Committee of Unsecured Creditors for Order Authorizing Committee to Pursue Certain Causes of Action on Behalf of Commonwealth and Granting Related Relief* [Docket No. 6325] (the “Committee Pursuit Motion”);
- h) Any objections, responses, statements, joinders, or replies to the Omnibus Objection, Procedures Motion, 926(a) Motion, Tolling Motion, the Joint Stip Motion and Committee Pursuit Motion (collectively, the “Motions”), including, but not limited to, the Motions, and any other related motions or responsive pleadings filed in connection with those matters; and

- i) Any other matters scheduled for the Hearing or statements made by any party in connection with the Title III cases, objections or any adversary proceeding pending therein.
- 3. In addition, Mr. Kenneth C. Suria and Mr. Alberto G. Estrella of Estrella LLC may also be attending the Hearing, on behalf of the Oversight Board, by telephone or in person in San Juan, Puerto Rico.

*[The remainder of this page is intentionally blank]*

WHEREFORE, the Oversight Board respectfully requests that the Court take notice of the foregoing.

Dated: April 19, 2019

/s/ Edward S. Weisfelner

BROWN RUDNICK LLP  
Edward S. Weisfelner, Esq. (*Pro Hac Vice*)  
Angela M. Papalaskaris, Esq. (*Pro Hac Vice*)  
Seven Times Square  
New York, NY 10036  
Tel: (212) 209-4800  
eweisfelner@brownrudnick.com  
apapalaskaris@brownrudnick.com

Sunni P. Beville, Esq. (*Pro Hac Vice*)  
One Financial Center  
Boston, MA 02111  
Tel: (617) 856-8200  
sbeville@brownrudnick.com

*Counsel to the Financial Oversight and Management  
Board, acting through the Special Claims Committee*

and

/s/ Kenneth C. Suria

ESTRELLA, LLC  
Alberto Estrella (USDC-PR 209804)  
Kenneth C. Suria (USDC-PR 213302)  
P. O. Box 9023596  
San Juan, Puerto Rico 00902-3596  
Tel.: (787) 977-5050  
Fax: (787) 977-5090

*Local Counsel to the Financial Oversight and Management  
Board, acting through the Special Claims Committee*